

**EXHIBIT  
F**

## ORAL AND VIDEOTAPED DEPOSITION OF PAMELA JAMES

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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION  
C.M. COLLINS, N.J. LUNDY )  
AND R.C.L. MAYES, )  
INDIVIDUALLY AND ON BEHALF )  
OF ALL OTHERS SIMILARLY )  
SITUATED )  
) CIVIL ACTION NO.  
VS. ) 4:22-CV-1073  
)  
CATASTROPHE RESPONSE UNIT, )  
INC. AND CATASTROPHE )  
RESPONSE UNIT USA, INC. )

-----  
VIDEOTAPED DEPOSITION OF  
PAMELA JAMES  
SEPTEMBER 20, 2023  
-----

ANSWERS AND DEPOSITION OF PAMELA JAMES,  
produced as a witness at the instance of the  
Defendant, taken in the above-styled and -numbered  
cause on SEPTEMBER 20, 2023, from 10:33 a.m. to  
4:47 p.m., before CHARIS M. HENDRICK, a Certified  
Shorthand Reporter in and for the State of Texas,  
witness located in Lithonia, Georgia, pursuant to  
the Federal Rules of Civil Procedure, and the  
provisions stated on the record or attached hereto.

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## A P P E A R A N C E S

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FOR THE DEFENDANTS:  
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kbrumbalow@hallettperrin.com

ALSO PRESENT: MR. COLIN COUGHENOUR - VIDEOGRAPHER  
MR. ADAM DICKENS  
MS. CEICILI MORALES

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## P R O C E E D I N G S

THE VIDEOGRAPHER: This is September  
20th, 2023. The time is 10:33 a.m. and we are on  
the record.

THE REPORTER: The court reporter is  
located in Ellis County, Texas and the witness is  
located in Lithonia, Georgia.

PAMELA JAMES,  
having been first duly sworn, testified as follows:

## E X A M I N A T I O N

BY MR. HURST:

Q. Good morning. My name is Monte Hurst; I  
am with the law firm of Hallett & Perrin. Can you  
please state your full name for the record?

**A. Pamela James.**

Q. Do you have a middle name?

**A. Ann Marie.**

Q. Pamela Ann Marie James?

**A. Yes, sir.**

Q. Ms. James, you know that I represent  
Catastrophe Response Unit USA and Catastrophe  
Response Unit, Inc. in this case?

**A. Okay.**

Q. I would like to enter into some agreements  
with you before we go into your deposition. Number

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1 something may present a different tone than was  
2 intended. So I prefer to have a phone conversation  
3 where I can, you know, vouch -- my defense or  
4 grievances or give my feedback. And it's taken  
5 care of then and there as opposed to an email chain  
6 going back and forth and nothing is resolved.

7 Q. Now, each time you were being deployed by  
8 CRU, you understood that you would be performing  
9 work as an independent contractor, correct?

10 A. That's -- that's correct.

11 Q. That is correct?

12 A. Yes.

13 Q. Each time you were deployed by CRU, you  
14 understood that CRU would pay you for your services  
15 and would, at the end of the year, issue a Form  
16 1099?

17 A. That's correct.

18 Q. You would then use that Form 1099 to file  
19 your taxes with the US Internal Revenue Service,  
20 correct?

21 A. That's the intent.

22 Q. Did you file taxes?

23 A. No.

24 Q. Why not?

25 A. I haven't gotten --

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1 A. I think my last was 20 -- 2019.

2 Q. So you haven't filed taxes for '20, '21 or  
3 '22?

4 A. That was about right.

5 Q. And, again, because you haven't gotten  
6 around to it yet?

7 A. That's correct.

8 Q. Is there someone handling your taxes for  
9 you?

10 A. The last person that did it -- currently,  
11 no.

12 Q. So you intend to prepare your taxes  
13 yourself?

14 A. No. I'm going to seek assistance.

15 Q. And you haven't selected anyone to provide  
16 assistance yet, right?

17 A. That's correct.

18 Q. But your intent is to file 2021 and '22 by  
19 the end of this year, 2023?

20 A. That's the intent, yes.

21 Q. And are you keeping the government -- the  
22 IRS apprised of your intent?

23 A. No.

24 Q. Is the IRS asking you where your taxes  
25 are?

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1 THE REPORTER: I am sorry, say it  
2 again.

3 A. Have not gotten around to doing it just  
4 yet.

5 Q. (By Mr. Hurst) Okay. Are you talking  
6 about 2022?

7 A. Yes.

8 Q. Did you file taxes for 2021?

9 A. No.

10 Q. Do you intend to do so?

11 A. Yes.

12 Q. When?

13 A. Eventually.

14 Q. Do you have a plan for when you are going  
15 to?

16 A. Yes.

17 Q. What is that plan?

18 A. Hopefully, before year's end.

19 Q. And the reason you haven't is because you  
20 haven't gotten around to it?

21 A. That's correct.

22 Q. But you recognize that you are responsible  
23 to do so?

24 A. Yes, sir.

25 Q. Have you filed taxes for 2020?

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1 A. I have not received anything in the mail,  
2 not to my knowledge.

3 Q. When you work as an independent  
4 contractor, how is it that you pay money towards  
5 your taxes?

6 A. I have not filed taxes yet, so --

7 Q. You haven't filed taxes yet, ever, or in  
8 2020, '21 and '22?

9 A. '20, '21, '22.

10 Q. Had you been an independent contractor in  
11 2019 or anytime there before?

12 A. No.

13 Q. Each time that you were deployed by CRU,  
14 you understood that CRU would not be withholding  
15 taxes from your compensation, correct?

16 A. That's correct.

17 Q. Each time you were deployed by CRU, you  
18 understood that you would be responsible for all  
19 tax obligations arising from your performance of  
20 services for CRU?

21 A. That's correct.

22 Q. Did you ever speak with any of your fellow  
23 adjusters about how it is that he, she or they paid  
24 money to the government for taxes?

25 A. Can you repeat that for me?

## ORAL AND VIDEOTAPE DEPOSITION OF PAMELA JAMES

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1 THE VIDEOGRAPHER: The time is,  
2 approximately, 4:47 p.m. and we are off the record.  
3 (End of Proceedings.)  
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1 I, PAMELA JAMES, have read the foregoing  
2 deposition and hereby affix my signature that same  
3 is true and correct, except as noted above.  
4  
5

PAMELA JAMES

6  
7 THE STATE OF \_\_\_\_\_  
8 COUNTY OF \_\_\_\_\_

9 Before me, \_\_\_\_\_, on this day  
10 personally appeared PAMELA JAMES, known to me (or  
11 proved to me under oath or through \_\_\_\_\_) to  
12 be the person whose name is subscribed to the  
13 foregoing instrument and acknowledged to me that  
14 they executed the same for the purposes and  
15 consideration therein expressed.

16 Given under my hand and seal of office this \_\_\_\_\_  
17 day of \_\_\_\_\_, 2023.

18 NOTARY PUBLIC IN AND FOR THE  
19 STATE OF \_\_\_\_\_

20 MY COMMISSION EXPIRES: \_\_\_\_\_  
21  
22  
23  
24  
25

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1 CHANGES AND SIGNATURE

2 WITNESS NAME: PAMELA JAMES  
3 DATE OF DEPOSITION: SEPTEMBER 20, 2023  
4 PAGE LINE CHANGEREASON

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1 REPORTER'S CERTIFICATION  
2 IN THE UNITED STATES DISTRICT COURT  
3 FOR THE EASTERN DISTRICT OF TEXAS

4 SHERMAN DIVISION  
5 C.M. COLLINS, N.J. LUNDY )  
6 AND R.C.L. MAYS, )  
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10 ) CIVIL ACTION NO.  
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13 CATASTROPHE RESPONSE UNIT, )  
14 INC. AND CATASTROPHE )  
15 RESPONSE UNIT USA, INC. )  
16

17 DEPOSITION OF PAMELA JAMES  
18 SEPTEMBER 20, 2023  
19

20 I, CHARIS M. HENDRICK, Certified Shorthand  
21 Reporter in and for the State of Texas, do hereby  
22 certify to the following:

23 That the witness, PAMELA JAMES, was by me  
24 duly sworn and that the transcript of the oral  
25 deposition is a true record of the testimony given  
by the witness.

I further certify that pursuant to Federal  
Rules of Civil Procedure, Rule 30(e)(1)(A) and (B)  
as well as Rule 30(e)(2), that review of the  
transcript and signature of the deponent:

\_\_\_\_xx\_\_\_\_ was requested by the deponent and/or a

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1 party before completion of the deposition.  
2 \_\_\_\_\_ was not requested by the deponent and/or  
3 a party before the completion of the deposition.

4 I further certify that I am neither  
5 attorney nor counsel for, nor related to or  
6 employed by any of the parties to the action in  
7 which this deposition is taken and further that I  
8 am not a relative or employee of any attorney of  
9 record in this cause, nor am I financially or  
10 otherwise interested in the outcome of the action.

11 The amount of time used by each party at  
12 the deposition is as follows:

13 Mr. Hurst - 5:37 hours/minutes  
14  
15

16 Subscribed and sworn to on this 28th day  
17 of September, 2023.



18 *Charis M. Hendrick*  
19

20 CHARIS M. HENDRICK, CSR # 3469  
21 Certification Expires: 10-31-23  
22 Bradford Court Reporting, LLC  
23 7015 Mumford Street  
24 Dallas, Texas 75252  
25 Telephone 972-931-2799  
Facsimile 972-931-1199  
Firm Registration No. 38